# UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

#### IN RE ORGANOGENESIS SECURITIES LITIGATION

No. 04-CV-10027 (JLT)

## MOTION TO WITHDRAW MOTION FOR ENTRY OF PROTECTIVE ORDER

Defendants Albert Erani, Philip Laughlin, Donna Abelli Lopolito, Michael Sabolinski and Alan Tuck ("Defendants") respectfully move to withdraw their previously-filed Motion for Entry of Protective Order.

As grounds for this motion, the Defendants state:

- Defendants filed a Motion for Entry of Protective Order on June 15, 2006 (Docket # 125).
- 2. Following the filing of this Motion, the parties conferred and were able to reach agreement on the language of a Protective Order acceptable to all parties.
- 3. The parties will file a Joint Motion for Entry of Protective Order today, attaching a Joint [Proposed] Protective Order both parties agree upon.
- 4. Plaintiffs' motion for extension of time to respond to the Motion for Entry of Protective Order, filed July 7, 2006 (Docket # 130) is now moot.

WHEREFORE, the Defendants respectfully move to withdraw their Motion for Entry of Protective Order.

Dated: July 25, 2006

#### WILMER CUTLER PICKERING HALE AND DORR LLP

By: /s/ Kimberly Friday
Jeffrey B. Rudman (BBO #433380)
Jonathan A. Shapiro (BBO #567838)
Peter J. Kolovos (BBO #632984)
Kimberly I. Friday (BBO #660544)
60 State Street
Boston, MA 02109
(617) 526-6000

Counsel for Defendants Albert Erani, Donna Abelli Lopolito, Philip Laughlin, Michael Sabolinski, and Alan Tuck

### **LOCAL RULE 7.1(A)(2) CERTIFICATION**

Pursuant to Local Rule 7.1(A)(2), Defendants and Plaintiffs have conferred, and Plaintiffs assent to the filing of the Motion. Counsel for Defendants John Arcari and Herbert Stein also assent to this Motion.

#### **CERTIFICATE OF SERVICE**

I, Kimberly I. Friday, hereby certify	y that a true copy of the al	bove document was	served upon the
attorney of record for each party vis	a ECF.		

/s/ Kimberly Friday	
Kimberly Friday	